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September 12, 2007

**FILED ELECTRONICALLY AND BY PERSONAL DELIVERY**

Judge Richard M. Berman  
United States District Court  
Southern District of New York  
40 Centre Street, Courtroom 706  
New York, NY 10007

Re: Zim American Integrated Shipping Services Ltd. v. Belco Resources, Inc. et al.  
Docket no. 07 Civ. 5861 (RMB)(GWG)  
Our File: 1236-689

Dear Judge Berman:

We are attorneys representing ZIM INTEGRATED SHIPPING SERVICES, LTD., in the above captioned matter for a Rule B maritime attachment and garnishment and we file the present letter application to request from the Court the issuance of two proposed amended orders of the Court and the authorization to amend the summonses as a result of the filing of our first amended complaint.

We filed the first amended complaint without leave of the Court today against all five defendants in this action pursuant to Fed. R. C. P. Rule 15(a) (attached hereto is the first amended verified complaint and its supporting affidavit). The amended complaint reflects notably changes in the names of two Chinese defendants, adds a sixth cause of action for punitive damages, and seeks joint and several liability of all defendants on all six causes of action. The amount of estimated damages suffered by the plaintiff remains unchanged but we make it clear that we are seeking the full amount of damages as against each and everyone of the defendants.

As a result of the filing of the first amended complaint, we respectfully request that the Court:

1. allows us to amend the summonses pursuant to Fed. R. C. P. Rule 4(a) to reflect the changes in the names of two defendants;
2. issues the proposed amended order of maritime attachment and garnishment attached hereto;
3. issues the proposed amended order of substitute process server attached hereto;

Judge Richard M. Berman  
September 12, 2007  
Page 2

Upon issuance of the amended orders by Your Honor, we intend to serve the amended orders and the verified complaint on all garnishees.

We thank Your Honor for his attention in this matter.

Respectfully Submitted,

DEORCHIS, WIENER & PARTNERS, LLP

By



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Judge Richard M. Berman  
September 12, 2007  
Page 3

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